

FILED**JUL - 3 2019**U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUISUNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. S1-4:18-CR-829 CDP (NCC)
)	
ANTHONY MORGAN,)	Counts 1, 2, 3, 4, 5
a/k/a "Big Ant,")	
LARRY DOWNS,)	Count 1
a/k/a "Grandpa,")	
FREDRICK WILLIS,)	Count 1
a/k/a "Fresh,")	
)	
Defendants.)	

SUPERSEDING INDICTMENT**Count I**

The Grand Jury charges that:

Beginning at a time unknown to the Grand Jury, but including between October 1, 2017 through April 25, 2018, with the exact dates known and unknown to this Grand Jury, in St. Louis County, State of Missouri and elsewhere within the Eastern District of Missouri, the defendants,

**ANTHONY MORGAN,
LARRY DOWNS,
FREDRICK WILLIS,**

did knowingly and intentionally conspire, combine, confederate and agree with each other and other persons both known and unknown to this Grand Jury, to commit offenses against the United States, to wit: to knowingly and intentionally distribute and possess with intent to distribute a controlled substance, heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846; and

Quantity of Heroin Involved in the Conspiracy

1. With respect to **ANTHONY MORGAN**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him is 1 kilogram of heroin or more, thereby making the offense punishable under Title 21, United States Code, Section 841(b)(1)(A); and

2. With respect to **LARRY DOWNS**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him is 1 kilograms of heroin or more, thereby making the offense punishable under Title 21, United States Code, Section 841(b)(1)(A); and

3. With respect to **FREDRICK WILLIS**, the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him is 1 kilograms of heroin or more, thereby making the offense punishable under Title 21, United States Code, Section 841(b)(1)(A); and

Count II

The Grand Jury further charges that:

On or about May 7, 2018, in St. Louis County, State of Missouri, within the Eastern District of Missouri, the defendant,

ANTHONY MORGAN

did knowingly and intentionally distribute heroin, a schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

Count III

The Grand Jury further charges that:

On or about May 17, 2018, in St. Louis City, State of Missouri, within the Eastern District of Missouri, the defendant,

ANTHONY MORGAN

did knowingly and intentionally distribute more than 100 grams of heroin, a schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(B).

Count IV

The Grand Jury further charges that:

On or about June 6, 2018, in St. Louis City, State of Missouri, within the Eastern District of Missouri, the defendant,

ANTHONY MORGAN

did knowingly and intentionally distribute heroin, a schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(C).

Count V

The Grand Jury further charges that:

On or about June 26, 2018, in St. Louis County, State of Missouri, within the Eastern District of Missouri, the defendant,

ANTHONY MORGAN

did knowingly and intentionally distribute more than 100 grams of heroin, a schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), and punishable under Title 21, United States Code, Section 841(b)(1)(B).

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 21, United States Code, Section 853(a), upon conviction of an offense in violation of Title 21, United States Code, Sections 841(a)(1) and 846 as set forth in Counts I, II, III, IV, and/or V of this indictment, the defendants, **ANTHONY MORGAN, LARRY DOWNS, FREDRICK WILLIS**, shall forfeit to the United States of America any property, constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as a result of such violation/s and any property used, or intended to be used, in any manner or part to commit or to facilitate the commission of such violations.

2. Subject to forfeiture upon a conviction of Counts I, II, III, IV, and/or V is a sum of money equal to the total property constituting, or derived from, any proceeds obtained directly or indirectly as a result of such violations.

3. The specific property subject to forfeiture includes, but is not limited to, the following:

a. Ten thousand, six-hundred and ninety-one dollars (\$10,691.00) in United States Currency located and seized by law enforcement from **ANTHONY MORGAN's** residence, 2 Monarch Trace Court, #202, Chesterfield, Missouri on or about July 12, 2018.

4. If any of the property described above, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to 21 U.S.C. § 853(p).

A TRUE BILL.

FOREPERSON

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